

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:24-cr-00379 JAR PLC
)	
DONALD HELD)	
)	
Defendant.)	

MOTION TO RECONSIDER ORDER OF DETENTION

COMES NOW the Defendant Donald Held, hereinafter (“Held”), by and through undersigned counsel, Cira R. Duffe, and moves for this Court to reconsider his previously ordered detention and requests a hearing. In support thereof, undersigned counsel states as follows:

1. Held is charged with Receipt of Child Pornography and Distribution of Child Pornography.
2. Held has no significant criminal history. His criminal history is limited to misdemeanor driving while intoxicated offenses in 1997 and 2010, respectively. He successfully completed probation for the misdemeanor offenses incurred more than 14 years ago.
3. While Held does not own property, he is a lifelong resident of Warren County, Missouri where he lives with his parents in his childhood home in the same town where he was raised, went to high school, and has resided most of his life.
4. Held does not own a passport, has never traveled out of the United States, and has left the state only for a very brief 3-month period of time more than 10 years ago for long-ago held employment.

5. While the Pretrial Services Report cites Held maintains family ties outside of the district, the referenced relationship is that of his sole sibling, a 46 year old sister who works and is well-established in her own community. He further reports having lived with his parents as an adult since 2018 and residing in Warren County, Missouri for his entire life but for 3 months more than 10 years ago when he worked out-of-state. More accurately stated, Held maintains a relationship with a single family member who lives in a neighboring state where she is well-established.
6. Held lives with, helps care for, and is the only child who lives close enough to provide the necessary care for his elderly parents and their rural, farmland property.
7. Held will reside with his parents if granted pretrial release.
8. Held has maintained employment as a tradesman most of his life which was confirmed by his mother and included in the the Pretrial Services Report. Held has confirmed his employer will allow him to return to work if he is granted bond.
9. Held does not own a passport and has very limited travel outside the state more than 10 years ago.
10. While the Pretrial Release discussed Held's use of electronics in forming the conclusion that he should not be released, that issue can be cured with reasonable conditions. Held can be placed on GPS monitoring and prohibited from utilizing electronics if afforded bond.
11. Held will participate in treatment services afforded similarly situated defendants if granted bond and released from confinement on pretrial release. Said services will provide a therapeutic element that better protects the public than detention without services.

WHEREFORE, Defendant prays this Court allow a hearing as there is additional information that the Defendant would like to present in support of his motion for the Court to reconsider his Order of Detention, and any other relief this Court deems appropriate.

Respectfully Submitted,

/s/ Cira R. Duffe
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically with the Clerk of the Court to be served by the operation of the Court's electronic filing system upon the parties of record.

/s/ Cira R. Duffe